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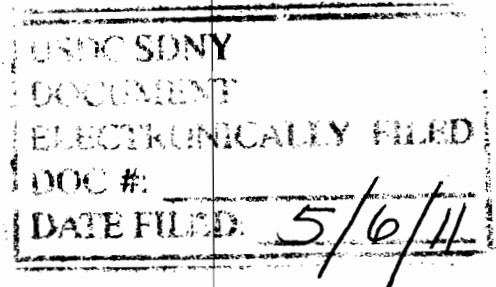
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MEMO ENDORSED

May 5, 2011

BY HAND

Honorable Miriam Goldman Cedarbaum
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312



Re: *Strickland v. Wang Hongjun*, C.A. No. 1:10-cv-05445 (MGC)
Drobner v. Wang Hongjun, C.A. No. 1:10-cv-06319 (MGC)
Nicoln v. Wang Hongjun, C.A. No. 1:10-cv-06344 (MGC)

Dear Judge Cedarbaum:

We represent plaintiffs Judith Strickland and Jono Nicoln. We write on behalf of plaintiffs in all the above-referenced derivative actions to respectfully request a brief extension of time for submission of plaintiffs' opposition to the motions of defendant Bruce and the nominal defendant China North East Petroleum Holdings, Inc. ("CNEP") to dismiss the Consolidated Class Action Complaint.

The return date for both motions is May 19, 2011. Pursuant to Your Honor's Individual Practices, Plaintiffs' opposition to defendant Bruce's motion is presently due on May 11, 2011. Plaintiffs had previously agreed to submit their opposition to the CNEP motion by May 9, 2011.

Plaintiffs respectfully request a brief extension of time, until May 13, 2011, to submit their opposition to both motions. In order to avoid prejudicing defendants, Plaintiffs also respectfully request that the return date for both motions be adjourned until May 26, 2011. We have consulted with counsel for CNEP and defendant Bruce and they have consented to this request.

*Request granted.
So ordered, May 6, 2011*

United States District Judge

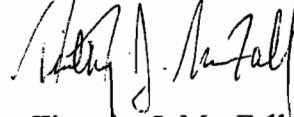
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Hon. Miriam Goldman Cedarbaum
May 5, 2011
page 2

We thank the Court for its consideration of this request and we will, of course, promptly respond to any questions or concerns Your Honor might have.

Respectfully,

A handwritten signature in black ink, appearing to read 'Timothy J. MacFall', written over a horizontal line.

Timothy J. MacFall

cc: Michael J. Coffino (by email)
Edwin G. Schallert (by email)
Richard Speirs (by email)
Robert Weiser (by email)
Robert C. Schubert (by email)
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